

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury
Court File No.

Deborah Lokke,

Plaintiff,

v.

SUMMONS

ADESA Minneapolis,


Defendant.

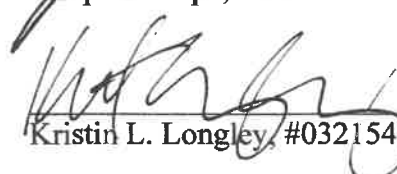
THE STATE OF MINNESOTA TO THE ABOVE-NAMED DEFENDANT:

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.
2. **YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a **written response** called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at: Suite 630B, Butler Square Building, 100 North Sixth Street, Minneapolis, MN 55403.
3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.
5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**
6. **ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: March 24, 2021


Joseph P. Pope, #0400472


Kristin L. Longley, #0321540

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STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
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Deborah Lokke,

Plaintiff,

v.

COMPLAINT

ADESA Minneapolis,

Defendant.

THE STATE OF MINNESOTA TO THE ABOVE-NAMED DEFENDANT:

Plaintiff, for her claim for relief states and alleges that:

I.

On or about February 27, 2018, Plaintiff was working as a driver and vehicle inspector at a live auction, under the direction of ADESA Minneapolis, when she slipped on ice and fell backwards, landing on and hitting her buttocks and head. Plaintiff sustained injuries to her head, back, neck, buttocks, and tailbone. Additionally, she was diagnosed with a concussion and experienced vestibular, vision, and balance issues as a result of said concussion. Plaintiff continues to experience post-concussion headaches, sleep difficulties, balance issues, vision disturbances, back and neck pain, and is still unable to sleep through the night, due to this fall.

II.

That these injuries were a direct result of Defendant's inattention, carelessness, and negligence—particularly regarding the maintenance and supervision of the ice-covered lot.

III.

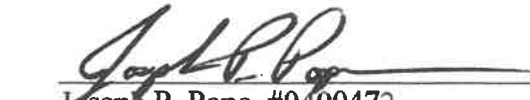
That, as a result of the negligence of Defendant ADESA Minneapolis, Plaintiff sustained injuries and was otherwise severely and permanently injured, satisfying the thresholds set forth at Minn. Stat. § 65B.51; has in the past and will in the future incur medical and chiropractic expenses for the treatments of her injuries; has in the past and will in the future incur a loss of earnings and earning capacity; has in the past and will in the future suffer physical and mental pain; and, has been thereby damaged and injured in an amount greater than \$50,000.00.

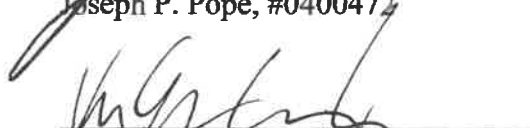
WHEREFORE, Deborah Lokke demands judgment against Defendant ADESA Minneapolis as follows:

1. Plaintiff demands judgment against the Defendant in an amount greater than Fifty Thousand Dollars (\$50,000.00);
2. For all applicable interest, costs, disbursements, and attorneys' fees incurred herein; and,

For such further relief as the Court deems just and equitable.

Dated: March 24, 2021


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